

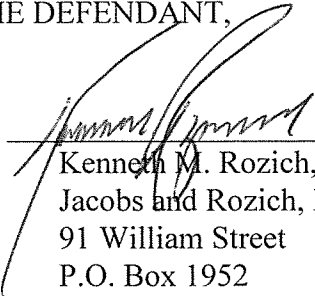
DOCKET NO. NNH-CV-18-6080436-S : SUPERIOR COURT  
CITY OF NEW HAVEN : JUDICIAL DISTRICT OF  
 : NEW HAVEN  
V. :  
ACHTOV, LLC ET AL : JULY 3, 2018

**DISCLOSURE OF DEFENSE**

In accordance with Practice Book § 13-19 et seq. (2018), the undersigned hereby discloses that the Defendant, Achtov, LLC has one or more bonafide defenses to the claims asserted by the Plaintiff in the above-captioned matter. Specifically, that the Plaintiff has denied said Defendant the use and benefit of the subject property through improper and arbitrary enforcement of building codes, zoning regulations and blight ordinances. Defendant has been prevented from developing the subject property while being taxed. The Plaintiff has acted with unclean hands. Said Defendant reserves the right to supplement this disclosure as more information becomes available through discovery.

THE DEFENDANT,

By



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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was mailed to the following  
counsel of record, pro se parties and/or non-appearing defendants this 3<sup>rd</sup> day of July,

2018:

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Kenneth M. Rozich